

**REMARKS**

Claims 1, 2 and 4-24 are all of the claims presently pending in the application. Claim 1 has been amended to more particularly define the invention.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 1 and 2 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Claims 1, 2 and 4-24 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Domini et al. (U.S. Patent No. 6,085,206) (hereinafter “Domini”) in view of Schabes et al. (U.S. Patent No. 6,424,983) (hereinafter “Schabes”).

These rejections are respectfully traversed in the following discussion.

**I. THE CLAIMED INVENTION**

The claimed invention of exemplary claim 1, provides a method of intelligent spellchecking that includes comparing slot-filling information of the first parse to slot-filling statistics for the original word (e.g., see Application at page 11, lines 4-9). The method of the present invention takes into consideration an entire sentence and a structure of the entire sentence to determine whether a word is misspelled or not, which allows for more accurate spellchecking (see Application at page 3, lines 13-16).

**II. THE 35 U.S.C. 112, FIRST PARAGRAPH, REJECTION**

The Examiner has rejected claims 1 and 2 under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement.

Applicants respectfully submit that the claims have been amended to more particularly define the claimed invention. Specifically, claim 2 has been amended to recite, *inter alia*, “parsing the resulting sentence to produce a second parse, before said comparing slot-information of the first parse”.

Therefore, Applicants respectfully request the Examiner to reconsider and withdraw

this rejection.

### III. THE PRIOR ART REFERENCES

#### A. The Domini Reference

The Examiner alleges that Schabes would have been combined with Domini to form the claimed invention of claims 1, 2 and 4-24. Applicants submit, however, that even if combined, the alleged combination would not teach or suggest each and every element of the claimed invention.

That is, neither Domini nor Schabes, nor any combination thereof, teaches or suggests “*comparing slot-filling information of the first parse to slot-filling statistics for the original word*” as recited in claim 1, and similarly recited in claim 11, 20, 23 and 24.

Nowhere does Domini teach or suggest a method of intelligent spellchecking that includes comparing slot-filling information of the first parse to slot-filling statistics for the original word. Indeed, the Examiner does not even allege that Domini teaches or suggests this feature. In fact, the Examiner concedes that Domini does not teach or suggest this feature.

Furthermore, the novel features of the claimed invention are not taught or suggested by Schabes. Indeed, the Examiner alleges that Schabes discloses comparing slot-filling information of the first parse to slot-filling statistics for the original word. The Examiner attempts to rely on column 10, lines 35-65 of Schabes to support his allegations. The Examiner, however, is clearly incorrect.

That is, nowhere, in this passage (nor anywhere else for that matter) does Schabes teach or suggest a method of intelligent spellchecking that includes comparing slot-filling information of the first parse to slot-filling statistics for the original word. Indeed, Schabes merely teaches a method dealing with compound words and lexical phrases (see Schabes at column 18, line 21 through column 19, line 12). Compound words are understood by those of ordinary skill in the art to mean “adjacent words”. Also, lexical phrases are typically adjacent words such as “take place” (this is also evidenced by Schabes’ examples at column 18, lines 25-50).

In contrast, the claimed invention uses a parse to determine the slot-filling relations, which means that the claimed invention can handle long-distance relations, and apply statistical information in these cases. For example, if a sentence recited “Which flour did you say was growing in the garden?”, the claimed invention would determine that the writer

actually intended to say “flower” as opposed to “flour”. Here, the parse supplies a user with the long-distance information that “flour” is the subject of grow, and the statistical database of slot-filling data indicates a strong preference for “flower” being the subject of grow rather than “flour”. This feature is not taught or suggested by Schabes.

Therefore, Schabes fails to make-up for the deficiencies of Domini.

Therefore, Applicants respectfully submit that even if combined, the alleged combination would not teach or suggest each and every element of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection.

### **III. FORMAL MATTERS AND CONCLUSION**

In Applicants’ Amendment filed on May 24, 2005 (in response to the Examiner’s Office Action dated March 24, 2005), Applicants provided detailed traversal arguments to overcome the Examiner’s 35 U.S.C. 102 rejection based on Domini and the Examiner’s 35 U.S.C. 103 rejection based on the combination of Domini and Schabes. In the Amendment filed on May 24, 2005 Applicants incorporated the subject matter of dependent claim 3 into the independent claims.

In the Examiner’s Office Action dated March 24, 2005, dependent claim 3 was rejected under 35 U.S.C. 103 over Domini in view of Schabes. Applicants provided traversal arguments to overcome the Examiner’s rejection. In the Examiner’s Office Action dated August 29, 2005, the Examiner again applied previously cited Domini in combination with previously cited Schabes in a 35 U.S.C. 103 rejection of claim 1. However, nowhere has the Examiner responded to Applicants traversal arguments.

Indeed, the Examiner merely states that “Applicant’s arguments and amendments filed on 06/21/2005 have been fully considered but they are not deemed fully persuasive”. However, the Examiner has provided no explanation as to why the arguments are not persuasive. Furthermore, the Examiner indicated that “Applicant’s arguments with respect to claims 1, 11, 20 and 23-24 have been considered but are moot in view of the new ground(s) of rejection as explained here below” (see Office Action dated August 29, 2005 at page 11). However, the Examiner has not provided any further explanation.

Therefore, if the Examiner wishes to maintain this rejection, Applicants respectfully request the Examiner to fully respond to Applicants’ traversal arguments and to provide a full

explanation for the Examiner's Response to Arguments in a new non-final Office Action.

In view of the foregoing, Applicants submit that claims 1-2, and 4-24, all of the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

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